

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America)

v.)

Denise Christine JONES)

Defendant(s)

Case No.

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICOMAR 06 2017 W
MATTHEW J. DYKMAN
CLERK

17mj 589

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3/5/2017 in the county of Bernalillo in the
Judicial District of New Mexico, the defendant(s) violated:

Code Section

21 USC 841 (a)(1), (b)(1)(A)

Offense Description

Possession of more than one kilogram of
Phencyclidine (PCP) with intent to
distribute

This criminal complaint is based on these facts:

*** SEE ATTACHED AFFIDAVIT ***

☒ Continued on the attached sheet.

Complainant's signature

Jarrell W. Perry, Special Agent DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/6/2017City and state: Albuquerque, New Mexico

Judge's signature

Printed name and title

AFFIDAVIT

On March 5, 2017, Drug Enforcement Administration (DEA) Special Agent (S/A) Jarrell W. Perry was at the Amtrak Train Station, 320 First Street, Albuquerque, New Mexico to meet the eastbound Amtrak Train which makes a regularly scheduled stop in Albuquerque, New Mexico.

S/A Perry approached a female, later identified as Denise Christine JONES, who was seated in her respective seat in the coach section of the Amtrak Train. S/A Perry displayed his DEA badge to JONES, identified himself as a police officer to JONES, asked for and received permission to speak with JONES.

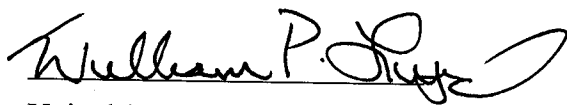
After a short conversation about her travel, S/A Perry asked JONES if she had any luggage with her. JONES identified a backpack that was in the floor area as belonging to her. S/A Perry asked for and received permission from JONES to search her backpack for contraband. S/A Perry smelled an odor that he knew from experience to be consistent with Phencyclidine (PCP) emanating from backpack. S/A Perry observed a gift bag that inside of the backpack. JONES said that the gift bag contained a broken computer. S/A Perry observed that the gift bag was heavy and contained bottles. S/A Perry smelled the odor of Phencyclidine (PCP) emanating from the gift bag.

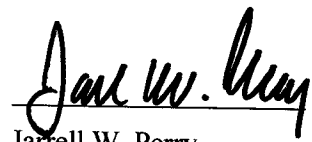
S/A Perry handcuffed JONES, thus placing her under arrest. JONES was removed from the Amtrak Train and transported to the Drug Enforcement Administration (DEA) Albuquerque District Office (ADO).

At the DEA ADO, S/A Perry removed a "Jose Cuervo" glass bottle containing a brown liquid and a "Gatorade" bottle also containing a brown liquid from JONES' backpack. S/A Perry weighed the two bottles containing the liquid and then weighed the two bottles empty. S/A Perry determined the gross weight of the suspected liquid Phencyclidine (PCP) to be approximately 2,584.63 gross grams. S/A Perry knew that this amount is consistent with a distribution amount and not a personal use amount. S/A Perry field-

tested the brown liquid from the two bottles and received a positive reaction for the presence of Phencyclidine (PCP).

This affidavit is submitted for the limited purpose of providing probable cause to support the attached criminal complaint.


United States Magistrate Judge


Jarrell W. Perry
Special Agent
Drug Enforcement Administration